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*Sent by e-mail*

**Dear Rachel,**

**Switching Programme and Retail Code Consolidation: Proposed licence modifications**

We welcome the opportunity to respond to Ofgem's consultation on behalf of SSE Business Energy (SSE Energy Supply Limited).

We are generally in support of the Licence modification proposals as detailed within Ofgem's consultation however, we do believe that there is a need for additional clarity on some of the specific licence amendments to ensure there is a consistency across the market.

We believe the transition period should be consistent for all suppliers across the industry to ensure that there are no unintended consequences. For example, if a supplier has the ability to switch within two working days immediately, we believe there will be a disproportionate effect on competition in the market. All suppliers should transition at the same speed which will also ensure the market is working effectively once the transition period has lapsed.

We have provided further detail in response to Ofgem's questions in the attached appendix responding to questions that have a direct impact on us and would welcome the opportunity to discuss this further.

Yours sincerely,

**Victoria Burkett**  
Regulation Manager

**SSE plc**

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## **Annex 1**

### **Standard Licence Conditions: Electricity Supply Licence and Gas Supply Licence**

**Question 1.1.: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 3 for the Gas Supply Licence?**

**Question 1.2.: Do you agree with the proposed standard licences condition modifications as drafted in Appendix 2 for the Electricity Supply Licence?**

We agree with the proposed standard licence modifications where amendments to the respective codes have been made.

**Question 1.3.: Do you agree with our proposal to modify the five working day switching regulatory backstop by introducing a 5pm cut off on a working day, after which, if a consumer signs up, the start of the five working day period will be counted as the next working day?**

Yes, we agree with the amendment to amend the regulatory backstop however, there should be clear direction for this amendment in that the contract will be agreed at the time the customer has provided all the required information for the switch to progress. The current licence drafting is open to interpretation with what would be deemed as essential information, this needs to be clearly defined.

**Question 1.4.: Do you agree with our proposals to measure the start of the grace period, from which Supplier B must continue to supply the customer on the same tariff after the consumer has switched and cancelled, from the point that Supplier B sends notice to the consumer of their options and that the grace period should be 15 working days?**

**Question 1.5.: Do you agree with our proposals to measure the start of the period over which Supplier A must offer to take a customer back on equivalent terms from the switch date? Do you agree that the period that Supplier A must maintain this offer is 16 working days from the switch date?**

We do not have any material comments on these proposals given that they relate to the domestic sector. However, whilst the proposals above are specific to the cooling off period in which a non-domestic supplier is not obligated, we would like to draw Ofgem's attention to our response to the Microbusiness Customer (MBC) review in which we raised concerns about Ofgem's proposals to introduce a cooling off period for MBCs. In particular, we would highlight that the build for this programme is well under way and any proposed amendments to the current programme plan, could have a significant impact on the industry's ability to implement the programme to the current revised work plan.

### **Standard Licence Conditions: Gas Shipper Licence**

**Question 2.1.: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 4 for the Gas Shipper Licence?**

Yes, we do not have any comments to make.

**Standard Licence Conditions: Electricity Distribution Licence and Gas Transporter Licence**

**Question 3.2: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 6 (a-d) for the Gas Transporter Licence?**

Yes, we do not have any comments to make.

**Question 3.3: Do you think the change to the definition of Metering Point to remove direct reference to the codes is suitable, and do you consider there to be any risks or unintended consequences that we should take into account for our decision?**

Yes, we do not have any concerns with this proposal.